

USEPA/OECA/OC  
State and Tribal Assistance Grant (STAG) 2001-2002  
Oklahoma: Concentrated Animal Feeding Operation (CAFO) Inspector Training in Region 6  
DRAFT Proposal  
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**Agency:** Oklahoma Department of Agriculture, Food, and Forestry (ODAFF)  
Water Quality Services Division

**Title:** Concentrated Animal Feeding Operation (CAFO) Inspector Training in Region 6

**Objective:**

In 1972, EPA established the National Pollutant Discharge Elimination System (NPDES) program for regulating point source discharges into waters of the U.S. through permit issuance, permit compliance and enforcement of the terms of the permit. A part of the NPDES program has been regulation of Confined Animal Feeding Operation (CAFO) facilities. NPDES compliance inspections at CAFOs are recognized as a vital part of a state's enforcement program. Inspections for routine compliance monitoring are generally performed for each facility, approximately once per year. ODAFF is a state agency within Region 6 that has a quarterly inspector training program, allowing Oklahoma's CAFO inspectors to come together and learn about current regulatory issues and concerns on performing compliance inspections that need to be brought to their attention. The other states within Region 6 may also have CAFO inspector training, tailored and offered only to that state's inspectors. Region 6 EPA also frequently sponsors an EPA CAFO Inspector Training workshop in Dallas, Texas.

However, a more beneficial tool that can be used to present the widest range of environmental opportunities that also complements the state's individual training efforts may be implementing a regional CAFO Inspector Training. Working in conjunction with EPA, the Region 6 states of Oklahoma, Arkansas, Texas, Louisiana and New Mexico and the tribes can more directly protect the environment by assisting inspectors through sharing state program ideas and understanding national and state environmental issues. As part of a multi-state outreach program, ODAFF would offer to take an integral role in developing, sponsoring and sharing resources for a Regional Inspector workshop, to be held on an annual basis and rotating throughout the states within the region, if funding for this project becomes available in the ensuing years.

**Goal:**

The primary program objective is to provide training to CAFO inspectors by keeping them informed of new developments in the federal CAFO program, as well as providing information on the highlights of state inspection and enforcement issues on a regular, yearly basis. An example of the necessity for training can be seen with the newly developed EPA CAFO rules to be published on December 15, 2002. Although the rules will be published on the EPA website, general knowledge of the rules by the regulated community may be limited. Facilities may face a change in financial, operational and

maintenance resources in order to comply with the finalized CAFO regulations. Inspectors can help ease the transition for the facilities from the old rules to the new through their education from the workshop on the new rules. To ensure that all interested parties will be able to attend

the workshop, the grant provides the funding for travel, hotel room and per diem for the speakers and attendees.

The expertise provided from state and federal speakers will provide a day and one-half training session in Oklahoma to meet the following goals:

- Increased compliance assistance to CAFOs.
- Better ideas for targeting compliance assistance and inspections.
- Attendees who mention on the critique that they have improved their knowledge of regulatory issues by participating in the workshop.
- If funding for future workshops becomes available, the following year's workshop critique should include a section pertaining to how the inspectors used knowledge gained from this workshop as compliance assistance tools to assist facilities in compliance issues.

### **Results/Outcome:**

States and Regions will strive for a stronger and more effective integrated compliance assistance and enforcement program. The discussion will serve to create a more consistent CAFO inspection program between states. If the number of facility deficiencies discovered during routine compliance inspections at the facilities decrease, this would indicate improved compliance with regulations as a result of exchanging information between the inspectors and the facilities on permit requirements.

### **Budget Period:**

January 2003 to December 2003

### **Workplan:**

#### **Task 1: Formation of Oklahoma/EPA Planning Group and states/tribe Steering Committee.**

Activity A: Contact EPA in Dallas, Texas and discuss project. A core Planning Group consisting of the host state Oklahoma and EPA is to be formed. The host state is responsible for organizing the details of training preparation and managing the workshop. EPA's main role is that of advisor and facilitator in conference calls.

Activity B: Discuss prototype format for the workshop.

Activity C: Send letters to the other four Region 6 states and tribes to inform them of the upcoming Regional Inspector Training and ask them for involvement in creating a Steering Committee, consisting of designated representatives from each state, tribe and federal agency participating in the development of the workshop.

#### **Milestone Dates**

January - March 2003

#### **Cost:**

\$5200

#### **Task 2: Develop agenda, speaker selection, hotel preferences and critique for attendees.**

Activity A: Develop draft agenda and speaker selection with Steering Committee through a number of regularly scheduled conference calls over three months. Decisions for topics include research, technical innovation, compliance assistance, inspection policies and special enforcement problems. A special emphasis will be on the new federal CAFO regulations and the Region 6 new CAFO permit.

Activity B: Hotel and conference center criteria, particular requests to be met and the estimated number of attendees from each state also need to be discussed.

Activity C: A workshop critique to assist in organizing next year's session will also be developed.

Milestone Dates

April – June 2003

Cost:

\$5200

**Task 3: Selection of hotel, make travel arrangements and copy speaker handouts.**

Activity A: Host state will consider several hotel sites and select a finalist(s) for the Planning Group to review that best meets the criteria.

Activity B: Contract negotiations with preferred hotel are finalized.

Activity C: Travel arrangements for speakers, state and tribal staff are arranged.

Activity D: Speaker materials for handouts are sent to Oklahoma to be copied and placed in notebooks for attendees.

Milestone Dates

July – September 2003

Cost:

\$8700

**Task 4: Conduct training and review completed meeting critiques following meeting, compile results and provide to Steering Committee.**

Conduct training workshop and distribute critique to attendees at end of workshop to assist in planning the next event. Compile results of critique and send to Steering Committee.

Milestone Date

October 2003

Cost:

\$27,430

**Task 5: Final conference call with Steering Committee to discuss meeting and selection of next host state.**

Final conference call with Steering Committee to discuss thoughts on training outcome and to decide host state for next year's workshop.

Milestone Date

November 2003

Cost:

\$1735

**Task 6: Final report to EPA at conclusion of project.**

Milestone Date:

December 2003

Cost:

\$1735

**Outputs:**

Letter progress report

Due: Semi annually

April 2003 and October 2003

Final report

Due: April 2004

**Resource Allocation:**

Federal	\$50,000
State	<u>\$ 0</u>
Total Cost	\$50,000